

**U.S. Department of Justice***United States Attorney
Southern District of New York**26 Federal Plaza, 37th Floor
New York, New York 10278*

June 12, 2025

BY ECF

The Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Combs*, S3 24 Cr. 542 (AS)

Dear Judge Subramanian:

The Government respectfully submits this letter to identify certain exhibits that the Government intends to offer into evidence on Thursday, June 11, 2025 to which the defendant objects. Those exhibits are identified below:

Exhibit Number	Description	Bases for Admissibility
GX A-417	Chat between the defendant, Faheem Muhammed (the defendant's head of security), Kristina Khorram (the defendant's chief of staff), and Robin Greenhill (the defendant's accountant).	Fed. R. Evid. 801(d)(2)(B); 801(d)(2)(D); 801(d)(2)(E)
GX A-518	Chat between the defendant, Faheem Muhammed, and Damion Butler, a/k/a "D Roc" (a member of the defendant's security team).	Fed. R. Evid. 801(d)(2)(D); 801(d)(2)(E)
GX H-101-A	Chat between Casandra Ventura and D Roc.	Fed. R. Evid. 801(d)(2)(D); 801(d)(2)(E)
GX J-308	Chat between Mr. Muhammed and an individual who identifies himself as "Guido."	Fed. R. Evid. 801(d)(2)(D); 801(d)(2)(E)
GX J-141	Series of notes from Mr. Muhammed's iPhone from April 2018 through April 2023 showing incoming and outgoing cash transactions in connection with his employment with the defendant.	Fed. R. Evid. 801(d)(2)(D); 801(d)(2)(E)

Additionally, the Government will re-offer **GX A-629-A**, a chat between the defendant and Paul Offord, a/k/a "Uncle Pauly" (the defendant's former head of security), dated October 10, 2015. In this chat, Mr. Offord brings the defendant's attention to a disagreement between the defendant and Gina that had taken place the previous night and warns the defendant "if ANY ONE

called the police the police is 100 percent going to lock you.” The Government previously offered this exhibit on May 22, 2025, at which time the Court indicated that additional evidence would be required to lay a foundation for admission of this exhibit. (*See* Tr. 2414, 2423). Along with GX A-629-A, the Government will offer **GX 3A-151**, **GX 3A-154**, and **GX 6B-106**¹ which show that the defendant paid for [REDACTED] to travel to Atlanta on October 8, 2015 and that the defendant and “Pauly” departed Atlanta on October 10, 2015. The fact that the defendant, Gina, and Uncle Pauly were together in Atlanta at or around the time of the communication, in combination with George Kaplan’s testimony about Gina, including his observations of a prolonged fight between the defendant and Gina in the fall of 2015 (Tr. 2287-88), lays sufficient foundation for the Government to offer GX A-629-A as relevant under Fed. R. Evid. 401. Moreover, for the reasons stated in the Government’s letter dated May 21, 2025, GX A-629-A is highly probative. (*See also* Def. Ltr dated May 28, 2025 at 3 (“Rule 401 is a very low standard . . .”).

Respectfully submitted,

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¹ GX 3A-151 is properly admissible as a business record under Fed. R. Evid. 803(6) pursuant to the parties’ stipulation at GX 1309. The parties stipulated that GX 3A-154 is a true and accurate record from Combs Global; it is admissible under Fed. R. Evid. 801(d)(2)(D). GX 6B-106 is properly admissible as a business record under Fed. R. Evid. 803(6) pursuant to the parties’ stipulation at GX 1304.